



SDMS DocID

2198358

ORIGINAL
(Red)

HAZARDOUS WASTE SITE ASSESSMENT REPORTS

FINAL REPORT

MD-17 - FMC CORPORATION DISPOSAL SITE
1701 E. PATAPSCO AVE., BALTIMORE, MD

MD-77 - BATA SHOE COMPANY
U.S. ROUTE 40, BELCAMP, MD

JRB NO: 2-817-03-513-36

PREPARED FOR: USEPA REGION III
MD DEPT OF HEALTH AND MENTAL HYGIENE

PREPARED BY: JRB ASSOCIATES
8400 WESTPARK DRIVE
MCLEAN, VIRGINIA 22102

DATE: FEBRUARY 15, 1982

AUTHORIZATION

ORIGINAL
(Red)

This report was prepared under the auspices of the U.S. Environmental Protection Agency Technical Assistance Panels program. The Panels are authorized by Section 2003 of The Resource Conservation and Recovery Act of 1976 (RCRA), Public Law 94-580, requiring the U.S.E.P.A. to "provide teams of personnel, including federal, state and local employees or contractor . . . to provide states and local governments upon request with technical assistance on solid waste management, resource recovery and resource conservation." JRB Associates is the Panels contractor for EPA Region III. JRB Associates was directed to assist the Maryland Department of Health and Mental Hygiene in conducting its "Dumpsite Assessment" program. This report documents work conducted by JRB as part of this program.

ORIGINAL
(Red)

HAZARDOUS WASTE SITE ASSESSMENT REPORT

FINAL REPORT

FMC CORPORATION DISPOSAL SITE
1701 E. PATAPSCO AVENUE
BALTIMORE, MD 21226

MD-17

JRB NO: 2-817-03-513-36

PREPARED FOR: USEPA REGION III
MD DEPT OF HEALTH AND MENTAL HYGIENE

PREPARED BY: JRB ASSOCIATES
8400 WESTPARK DRIVE
MCLEAN, VIRGINIA 22102

DATE: FEBRUARY 15, 1982

TABLE OF CONTENTS

ORIGINAL
(Red)

1.0 SUMMARY AND RECOMMENDATIONS

APPENDIX A: ECKHARDT REPORT INTRODUCTION AND SITE DESCRIPTION

APPENDIX B: AREA MAPS

APPENDIX C: FORM T 2070-2 - USEPA. POTENTIAL HAZARDOUS
WASTE SITE IDENTIFICATION AND PRELIMINARY
ASSESSMENT

ORIGINAL
(Red)

1.0 SUMMARY AND RECOMMENDATIONS

Summary

The FMC Corporation operates a facility at 1701 E. Patapsco Avenue, Baltimore, Maryland. The site is located in an industrialized area, and is bounded by Patapsco Avenue on the north, Stonehouse Cove on the west and Curtis Bay to the south (see Map B-1). The entire FMC Corporation plant covers approximately 67.5 acres. The facility manufactures pesticides and plasticizers. FMC took over the site in 1956. In 1980, the site generated 6751 tons of designated hazardous wastes according to the Maryland Manifest Records.¹ This waste was taken to BFI-Solley Road, in Maryland, and several facilities outside the state.

The Waste Disposal Site Survey prepared by The Subcommittee on Oversight and Investigations of The House Committee on Interstate and Foreign Commerce (The Eckhardt Report) listed the site as having been used for disposal from "1978 to 1975". It is thought that the 1978 date is not correct, since disposal has occurred on-site since the 1960's.² The Eckhardt Report listed the amount of chemical process waste disposed on-site as being 45,000 tons, and consisted of acid solutions ($\text{pH} < 3$), base solutions ($\text{pH} > 12$), heavy metals, trace metals, organics and inorganics. The Report also stated that disposal practices used on-site consisted of landfill, pits, ponds and lagoons, incineration and treatment.

Background data on the site was collected during the period 12/2/81 to 12/10/81. This data search revealed that 45,000 tons of waste had been disposed on-site, but that 39,000 tons of that total had been incinerated.³ Of the remaining 6,000 tons, the majority consisted of polymerized tars and resins, and hardened sludges, which were placed in drums prior to disposal in the on-site landfill.⁴ Some liquids had been disposed of in the landfill, but

¹Manifest Records. MD Dept. of Health and Mental Hygiene. 1980.

²Personal Communication with Mr. Paul Stancil, MD DHMH. 12/7/81.

³Meeting notes of Mr. Daryl Palmer, MD DHMH. 5/30/80.

⁴Ibid.

ORIGINAL
(Red)

the common practice in the 1960's was to dump the liquids into the sewers.¹ Trace heavy metals may exist in the fill area. These metals resulted from cooling tower sludges, but are reported to exist in concentrations of less than 1%.² It is not known what quantities of liquids were disposed in the landfill.

The FMC Corporation stopped on-site disposal in 1975. The old fill area was capped with an unknown thickness of local clay (see Map B-2), and graded so that a small hill now lies over the fill area.³ This encourages runoff and prevents surface ponding and infiltration. Monitoring wells have been installed.⁴ The first results of the sampling program will be submitted by the company in March. No evidence of contamination has been detected in any of the monitoring wells.⁵ The wells are sampled for pH, TOC, TOX, 16 heavy trace metals and specific conductivity. These parameters are used as triggers; any elevated readings will trigger a more comprehensive sampling program. The plant is underlain by a french drain system, which drains water to the plant sewer system. Discharges from the sewer system are regulated under a NPDES permit.⁶ The site did notify as a RCRA generator, transporter and TSD FACILITY (MD003071875). Wastes listed as being handled on-site are listed in Table 1.

Based on the background data collected, the following conclusions are made:

- Substantially less than 45,000 tons of waste are disposed on-site. Thirty-nine thousand tons of waste were incinerated on-site, and 6,000 tons were disposed in an on-site landfill. The majority of the landfilled waste was drummed, and consisted of hardened sludges and polymerized tars and sludges. Small quantities of liquids may have been disposed on-site, but common practice was reported to consist of discharging liquid to sewers.
- The old landfill has been capped and graded to reduce infiltration. A french drain system plus the cap reduces the possibility of waste contacting ground water. Monitoring wells are in place and a sampling program is operating.

¹ Meeting notes of Mr. Daryl Palmer. MD DHMH. 5/30/80.

² Ibid.

³ Personal Communication with Joe Stang and Paul Stancil. MD DHMH. 12/7/81.

⁴ Ibid.

⁵ Ibid.

⁶ Meeting notes of Mr. Daryl Palmer. MD DHMH. 5/30/80.

ORIGINAL
(Red)

Recommendations

Based upon our conclusions, it is suggested that no further action be taken at the site other than continued sampling of in-place monitoring wells. Regular inspections of the site to assure that the cap remains intact, plus results from the sampling program should be sufficient to detect any migration or contaminants.

TABLE 1

ORIGINAL
(Red)

FMC Corporation - MD-17
1701 E. Patapsco Avenue
Baltimore, Maryland 21226

RCRA Notification - Wastes Handled On-Site

| | |
|------|--|
| F001 | Spent halogenated solvents used in degreasing |
| F002 | Spent halogenated solvents |
| F003 | Spent non-halogenated solvents |
| F004 | Creosols, cresylic acid, nitrobenzenes, still bottoms from their recovery |
| F005 | Methanol, toluene, methyl ethyl ketone, methyl isobutyl ketone, carbon disulfide, isobutanol, pyridine and still bottoms |
| U002 | Acetone |
| U013 | Asbestos |
| U019 | Benzene |
| U037 | Chlorobenzene |
| U044 | Chloroform |
| U056 | Cyclohexene |
| U068 | Dibromomethane |
| U090 | Dihydrosafrole |
| U112 | Ethyl acetate |
| U135 | Hydrogen sulfide; phenol |
| U141 | Isosafrole |
| U154 | Methanol |
| U190 | Phthalic anhydride |
| U203 | Safrole |
| U211 | Tetrachloromethane |
| U220 | Toluene |
| U239 | Xylene |

ORIGINAL
(Red)

APPENDIX A: ECKHARDT REPORT INTRODUCTION
AND SITE DESCRIPTION

ORIGINAL
(Red)

96th Congress }
1st Session }

COMMITTEE PRINT

{ COMMITTEE
PRINT 96-1FC 23

WASTE DISPOSAL SITE SURVEY

REPORT

together with

ADDITIONAL AND SEPARATE VIEWS

BY THE

SUBCOMMITTEE ON OVERSIGHT AND
INVESTIGATIONS

OF THE

COMMITTEE ON INTERSTATE AND
FOREIGN COMMERCE

HOUSE OF REPRESENTATIVES

NINETY-SIXTH CONGRESS

FIRST SESSION



OCTOBER 1979

U.S. GOVERNMENT PRINTING OFFICE

12-419 O

WASHINGTON : 1979

For sale by the Superintendent of Documents, U.S. Government Printing Office
Washington, D.C. 20402

ORIGINAL
(Red)

I. INTRODUCTION

A. OVERVIEW

The hazardous waste disposal problem may well be the single most significant environmental health issue of this decade. Millions of tons of toxic wastes are disposed of each year in an environmentally unsound manner resulting in what have been aptly labeled "ticking time bombs" which pose imminent and untold hazards to man and the environment.

In October of 1978, the Subcommittee on Oversight and Investigations of the Interstate and Foreign Commerce Committee, prompted by increasing hazardous waste disposal problems including events at Love Canal in Niagara Falls, New York, began an extensive investigation into the matter. The Subcommittee was interested in the magnitude of the problem and the adequacy of existing legislation to cope with it. In addition, the Subcommittee wanted to assess the U.S. Environmental Protection Agency's (EPA) progress in implementing a 1976 Congressional law—the Resource Conservation and Recovery Act (RCRA)¹—which provided EPA with the authority to regulate hazardous waste disposal, and to determine if RCRA would (1) allow for appropriate public response to situations like Love Canal and (2) preclude the possibilities for such situations in the future.

The Subcommittee's inquiries disclosed that despite enactment of hazardous waste legislation in 1976, little was known about the true magnitude of the problem. No one knew how many millions of tons of hazardous waste were generated each year. And more importantly, while it was believed that hundreds of "ticking time bombs" existed across the country, no one knew exactly how many, where they were located, or who was responsible for them.

Believing that it was most important to secure such information, and since EPA was not acting with dispatch to collect it, the Subcommittee decided to conduct its own survey—the first national study of waste disposal sites—to begin to determine the magnitude of the problem.

The purpose of the survey was to initiate a systematic effort to identify the number, nature, and location of all waste disposal sites across the country, whether they currently pose health or environmental hazards or not. As a first step, the Subcommittee requested the participation of the 53 largest domestic chemical companies. This was not to suggest that the disposal practices of the chemical industry are particularly bad or that the chemical industry is primarily responsible for hazardous sites. But the very nature of the chemical industry is such that large quantities of potentially dangerous wastes are generated, and the national survey had to begin somewhere. The results are only a sampling of the situation. All of the companies cooperated voluntarily. They provided information about the waste disposal practices of the 1,605 chemical plant facilities that they own or operate including data on 3,383 disposal sites used by these facilities since

¹ Pub. L. 94-580, Oct. 21, 1976.

1950. This report describes the intent, conduct, and findings of that survey.

The methodology for selecting the companies participating in the survey, their identity, the Subcommittee's letter of invitation, and the standardized questionnaire and related instructions which were furnished to the companies are set forth in Appendices A, B, C and D, respectively.

Each of the 1,605 facilities was asked to provide information on every site or location used since 1950 (or earlier if records or employees' memories permitted) for the disposal of wastes from the plant's chemical processes. Information requested included: amount and content of waste disposed at a particular site, kinds of disposal methods used at the site, current status of the site (open or closed), ownership of the site, and the site's name and location. For any waste hauled from the plant and taken to a location unknown to the plant operators, information was requested on the name of the hauler and the amount and content of the waste hauled. Facilities were also asked to report the amount of process waste generated at their plants during 1978 that was not directly reprocessed or recycled at the plant or covered by a National Pollutant Discharge Elimination System (NPDES) permit, and the methods by which these wastes were disposed.

ORIGINAL
(Red)

ORIGINAL
(Red)

MARYLAND

WASTE DISPOSAL SITE DIRECTORY

MARYLAND

BALTIMORE FMC CORPORATION, 1701 F PATAPSCO AVE. 21226

SITE IS LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY AND IS KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1978 TO 1975. SITE IS NO LONGER IN USE. AMOUNT OF CHEMICAL PROCESS WASTE DISPOSED OF AT THIS SITE THROUGH 1978 WAS REPORTED AS 450 HUNDRED TONS. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE ACID SOLUTIONS (WITH PH < 3), BASE SOLUTIONS (WITH PH > 12), HEAVY METALS AND TRACE METALS (BONDED ORGANICALLY AND INORGANICALLY), ORGANICS, INORGANICS AND MISCELLANEOUS WASTE MATERIAL. METHODS OF DISPOSAL INCLUDE MONO INDUSTRIAL WASTE LANDFILL, MIXED INDUSTRIAL WASTE LANDFILL, DRUMMED WASTE LANDFILL, PITS, PONDS AND LAGOONS, INCINERATION, TREATMENT (EG.: NEUTRALIZATION), REPROCESSING AND/OR RECYCLING AND OTHER UNCATAGORIZED METHODS.

BALTIMORE NORRIS FARM LANDFILL, ADDRESS UNREPORTED

SITE IS NOT LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY, BUT IS KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1972 TO 1979. AT TIME OF USE, SITE WAS OWNED BY CHEMICAL COMPANY INCLUDED IN THIS SURVEY. SITE IS STILL BEING USED. AMOUNT OF CHEMICAL PROCESS WASTE DISPOSED OF AT THIS SITE THROUGH 1978 WAS REPORTED AS 29.27 HUNDRED TONS. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE BASE SOLUTIONS (WITH PH > 12), ORGANICS AND INORGANICS. METHODS OF DISPOSAL INCLUDE MIXED INDUSTRIAL WASTE LANDFILL, DRUMMED WASTE LANDFILL, LANDFILL IN WHICH MUNICIPAL WASTE IS CO-DISPOSED, PITS, PONDS AND LAGOONS AND TREATMENT (EG.: NEUTRALIZATION).

BALTIMORE QUARANTINE ROAD LANDFILL, QUARANTINE ROAD LANDFILL 21226

SITE IS NOT LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY, BUT IS KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1966 TO 1979. AT TIME OF USE, SITE WAS OWNED BY CHEMICAL COMPANY INCLUDED IN THIS SURVEY. SITE IS STILL BEING USED. AMOUNT OF CHEMICAL PROCESS WASTE DISPOSED OF AT THIS SITE THROUGH 1978 WAS REPORTED AS 1,207 HUNDRED TONS. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE BASE SOLUTIONS (WITH PH > 12), HEAVY METALS AND TRACE METALS (BONDED ORGANICALLY AND INORGANICALLY), ORGANICS AND INORGANICS. METHODS OF DISPOSAL INCLUDE MIXED INDUSTRIAL WASTE LANDFILL, AND DRUMMED WASTE LANDFILL.

BALTIMORE REEDSBIRD LANDFILL, REEDSBIRD AVENUE

SITE IS LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY, KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1960 TO 1969. AT TIME OF USE, SITE WAS OWNED BY PRIVATE CONCERN OTHER THAN CHEMICAL COMPANY INCLUDED IN THIS SURVEY. SITE IS NO LONGER IN USE. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE HEAVY METALS AND TRACE METALS (BONDED ORGANICALLY AND INORGANICALLY) AND ORGANICS. METHODS OF DISPOSAL INCLUDE MIXED INDUSTRIAL WASTE LANDFILL AND LANDFILL IN WHICH MUNICIPAL WASTE IS CO-DISPOSED.

BALTIMORE TREATING PLANT, FOOT OF CHILDS ST., FAIRFIELD

SITE IS LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY AND IS KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1950 TO 1972. SITE IS NO LONGER IN USE. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE HEAVY METALS AND TRACE METALS (BONDED ORGANICALLY AND INORGANICALLY), ORGANICS AND INORGANICS. METHODS OF DISPOSAL INCLUDE LAND FARMING AND INCINERATION.

BALTIMORE COUNTY BROWNING FERRIS INDUSTRIES CHE, 8151 TRAPPE ROAD 21222

SITE IS NOT LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY, BUT IS KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1955 TO 1979. AT TIME OF USE, SITE WAS OWNED BY PRIVATE CONCERN OTHER THAN CHEMICAL COMPANY INCLUDED IN THIS SURVEY. SITE IS STILL BEING USED. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE HEAVY METALS AND TRACE METALS (BONDED ORGANICALLY AND INORGANICALLY), ORGANICS AND MISCELLANEOUS WASTE MATERIAL. METHODS OF DISPOSAL INCLUDE MIXED INDUSTRIAL WASTE LANDFILL, PITS, PONDS AND LAGOONS AND OTHER UNCATAGORIZED METHODS.

BALTIMORE COUNTY ROSS-TYLER, 101 MORRIS LANE, NORTH POINT RD. 21237

SITE IS NOT LOCATED ON PROPERTY OF CHEMICAL PLANT PARTICIPATING IN SURVEY, BUT IS KNOWN TO HAVE BEEN USED FOR DISPOSAL FROM 1971 TO 1978. AT TIME OF USE, SITE WAS OWNED BY PRIVATE CONCERN OTHER THAN CHEMICAL COMPANY INCLUDED IN THIS SURVEY. SITE IS STILL BEING USED. CHEMICAL COMPONENTS OF WASTE DISPOSED AT THIS SITE INCLUDE ACID SOLUTIONS (WITH PH < 3), BASE SOLUTIONS (WITH PH > 12), HEAVY METALS AND TRACE METALS (BONDED ORGANICALLY AND INORGANICALLY), ORGANICS, INORGANICS AND MISCELLANEOUS WASTE MATERIAL. METHODS OF DISPOSAL INCLUDE MONO INDUSTRIAL WASTE LANDFILL, MIXED INDUSTRIAL WASTE LANDFILL, DRUMMED WASTE LANDFILL, LANDFILL IN WHICH MUNICIPAL WASTE IS CO-DISPOSED, PITS, PONDS AND LAGOONS, DEEP WELL INJECTION, LAND FARMING, INCINERATION, TREATMENT (EG.: NEUTRALIZATION), REPROCESSING AND/OR RECYCLING AND OTHER UNCATAGORIZED METHODS.

ORIGINAL
(Red)

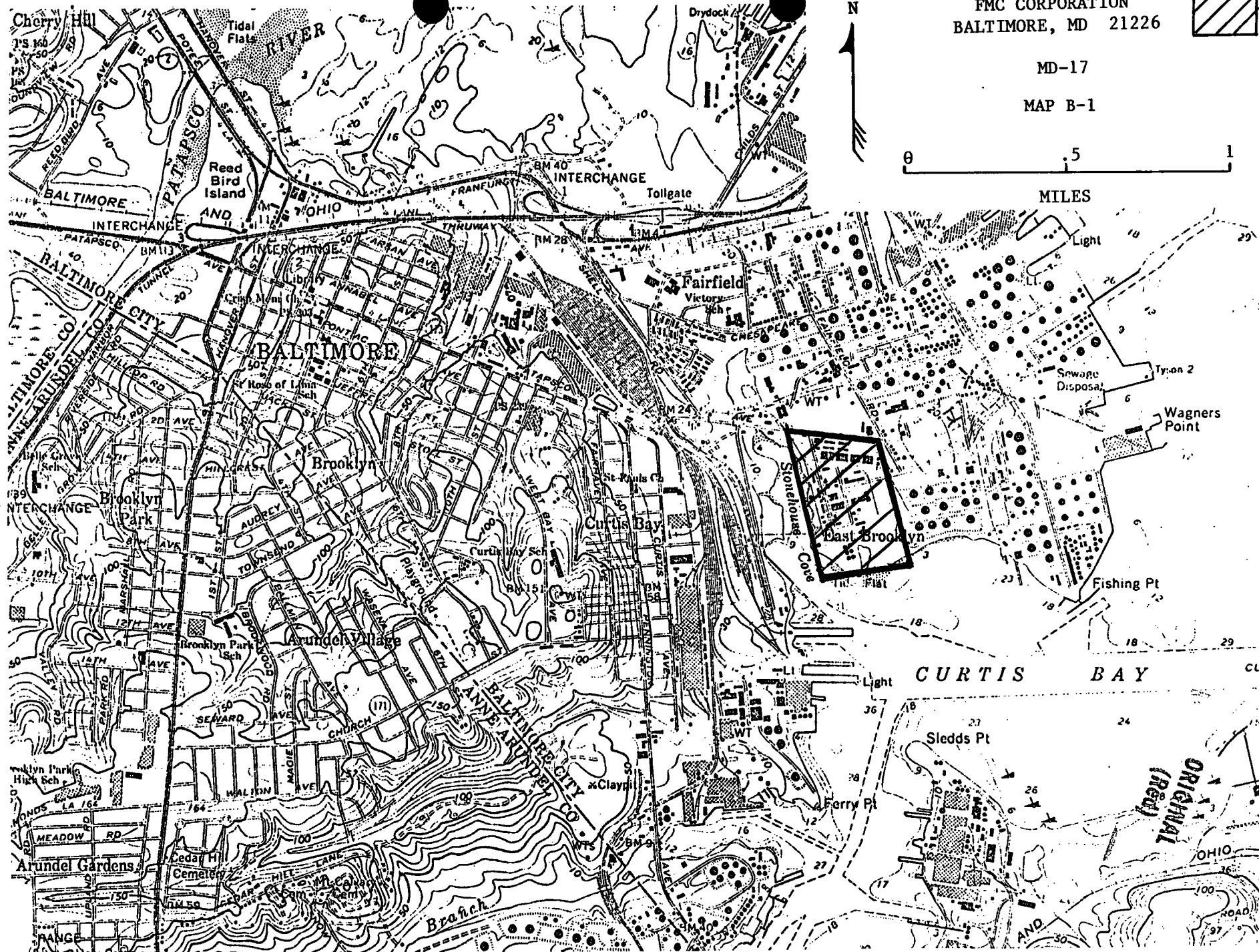
APPENDIX B: AREA AND SITE MAPS

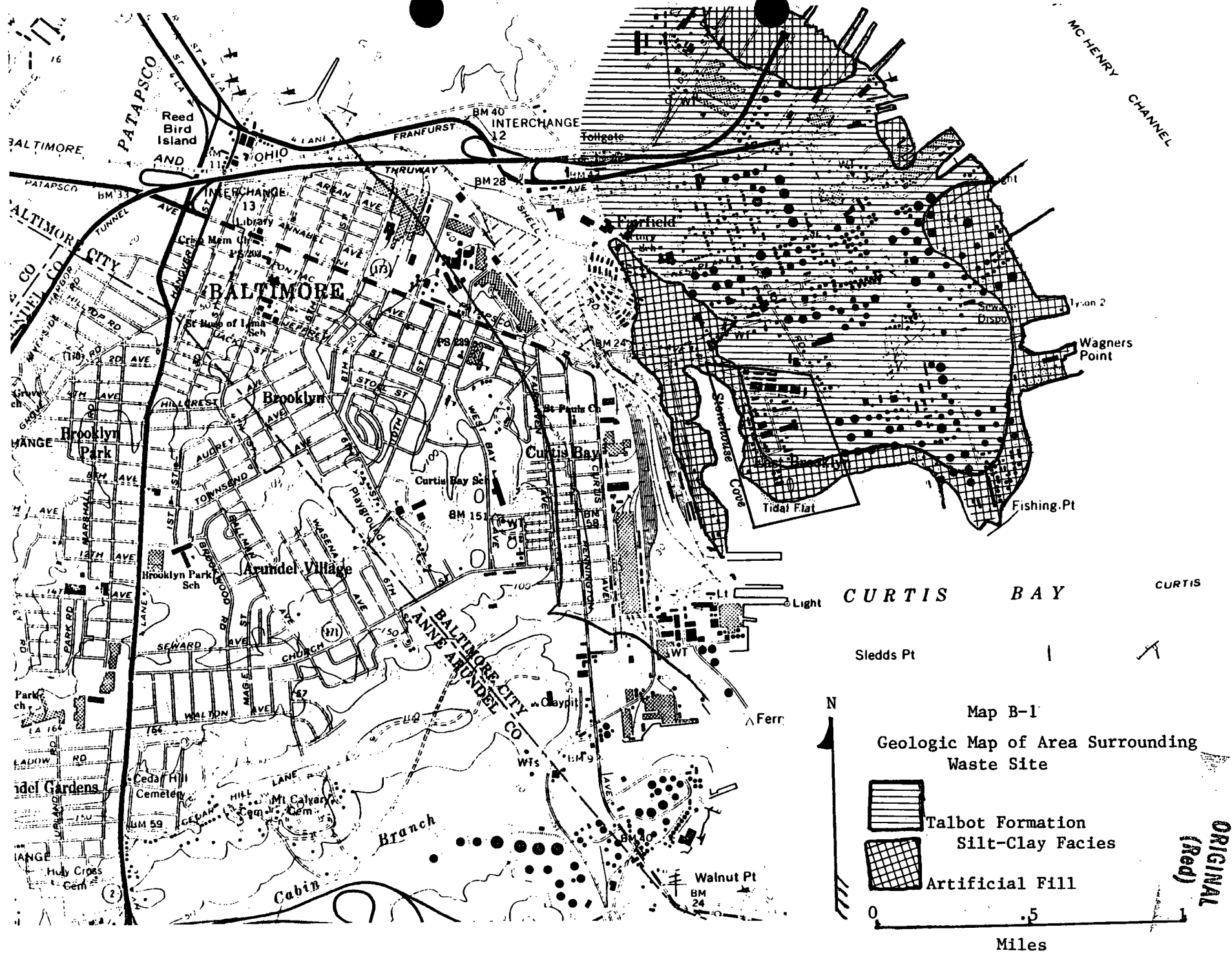
FMC CORPORATION
BALTIMORE, MD 21226



MD-17

MAP B-1





ORIGINAL
(Red)

APPENDIX C: U.S. EPA FORM T2070-2
POTENTIAL HAZARDOUS WASTE
IDENTIFICATION AND
PRELIMINARY ASSESSMENT



POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION 3 SITE NUMBER (to be assigned by Hq) MD-17

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

| | | | |
|---|----------------|--|-----------------------------|
| A. SITE NAME FMC Corporation Disposal Site | | B. STREET (or other identifier) 1701 E. Patapsco Avenue | |
| C. CITY Baltimore | D. STATE MD | E. ZIP CODE 21226 | F. COUNTY NAME Baltimore |
| G. OWNER/OPERATOR (if known) 1. NAME FMC Corporation | | 2. TELEPHONE NUMBER 301-355-6400 | |
| H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN | | | |

I. SITE DESCRIPTION

Old fill area used to dispose of waste including organics, inorganics, heavy and trace metals

HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.)

Congressman Eckhardt Report

K. DATE IDENTIFIED
(mo., day, & yr.)

L. PRINCIPAL STATE CONTACT

| | |
|---|-------------------------------------|
| 1. NAME Mr. Paul Thompson, MD Dept. of Health and Mental Hygiene | 2. TELEPHONE NUMBER 301-383-6650 |
|---|-------------------------------------|

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☐ 2. MEDIUM ☒ 3. LOW ☐ 4. NONE ☐ 5. UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED (no hazard)

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:

☐ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:

b. WILL BE PERFORMED BY:

b. WILL BE PERFORMED BY:

☒ 4. SITE INSPECTION NEEDED (low priority)

Regular state inspections should be sufficient continue sample program.

C. PREPARER INFORMATION

| | | |
|--|-------------------------------------|---------------------------------------|
| 1. NAME Edward Tokarski, JRB Associates | 2. TELEPHONE NUMBER 703-821-4600 | 3. DATE (mo., day, & yr.) 12/11/81 |
|--|-------------------------------------|---------------------------------------|

III. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

☒ 2. INACTIVE (Those sites which no longer receive wastes.)

☐ 3. OTHER (specify):
(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

☐ 1. NO

☒ 2. YES (specify generator's four-digit SIC Code): 2869/2879

C. AREA OF SITE (in acres)

67.5

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE (deg.-min.-sec.)

39° 13' 42"

2. LONGITUDE (deg.-min.-sec.)

76° 34' 57"

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO

☒ 2. YES (specify): Manufacturing facility

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

| A. TRANSPORTER | B. STORER | C. TREATER | D. DISPOSER |
|---|--|---|--|
| <input checked="" type="checkbox"/> 1. RAIL | <input checked="" type="checkbox"/> 1. PILE | <input checked="" type="checkbox"/> 1. FILTRATION | <input checked="" type="checkbox"/> 1. LANDFILL |
| <input checked="" type="checkbox"/> 2. SHIP | <input checked="" type="checkbox"/> 2. SURFACE IMPOUNDMENT | <input checked="" type="checkbox"/> 2. INCINERATION | <input checked="" type="checkbox"/> 2. LANDFARM |
| <input checked="" type="checkbox"/> 3. BARGE | <input checked="" type="checkbox"/> 3. DRUMS | <input checked="" type="checkbox"/> 3. VOLUME REDUCTION | <input checked="" type="checkbox"/> 3. OPEN DUMP |
| <input checked="" type="checkbox"/> 4. TRUCK | <input checked="" type="checkbox"/> 4. TANK, ABOVE GROUND | <input checked="" type="checkbox"/> 4. RECYCLING/RECOVERY | <input checked="" type="checkbox"/> 4. SURFACE IMPOUNDMENT |
| <input checked="" type="checkbox"/> 5. PIPELINE | <input checked="" type="checkbox"/> 5. TANK, BELOW GROUND | <input checked="" type="checkbox"/> 5. CHEM./ PHYS. TREATMENT | <input checked="" type="checkbox"/> 5. MIDNIGHT DUMPING |
| <input checked="" type="checkbox"/> 6. OTHER (specify): | <input checked="" type="checkbox"/> 6. OTHER (specify): | <input checked="" type="checkbox"/> 6. BIOLOGICAL TREATMENT | <input checked="" type="checkbox"/> 6. INCINERATION |
| | | <input checked="" type="checkbox"/> 7. WASTE OIL REPROCESSING | <input checked="" type="checkbox"/> 7. UNDERGROUND INJECTION |
| | | <input checked="" type="checkbox"/> 8. SOLVENT RECOVERY | <input checked="" type="checkbox"/> 8. OTHER (specify): |
| | | <input checked="" type="checkbox"/> 9. OTHER (specify): | |

ORIGINAL
(Red)

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Site manufactures organic chemicals and pesticides. Previously, waste had been incinerated, landfilled or placed in surface impoundment. No on-site disposal now occurs according to MD DHMH officials. Site has notified as RCRA generator, storer, TSD ... sent in Part A application

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. UNKNOWN ☒ 2. LIQUID ☒ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE

☒ 10. OTHER (specify): hardened sludges, polymerized tars and resins

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

total 45,000 tons. 39,000 tons incinerated, 6,000 tons landfilled

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

| a. SLUDGE | b. OIL | c. SOLVENTS | d. CHEMICALS | e. SOLIDS | f. OTHER |
|--|---|--|---|--|--|
| AMOUNT | AMOUNT | AMOUNT | AMOUNT | AMOUNT | AMOUNT |
| <input checked="" type="checkbox"/> X | | | | | |
| UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE |
| <input checked="" type="checkbox"/> (1) PAINT, PIGMENTS | <input checked="" type="checkbox"/> (1) OILY WASTES | <input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS | <input checked="" type="checkbox"/> (1) ACIDS | <input checked="" type="checkbox"/> (1) FLYASH | <input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT. |
| (2) METALS SLUDGES | (2) OTHER (specify): | (2) NON-HALOGENATED SOLVENTS | (2) PICKLING LIQUORS | (2) ASBESTOS | (2) HOSPITAL |
| (3) POTW | | (3) OTHER (specify): | (3) CAUSTICS | (3) MILLING/ MINE TAILINGS | (3) RADIOACTIVE |
| (4) ALUMINUM SLUDGE | | | (4) PESTICIDES | (4) FERROUS SMLTG. WASTES | (4) MUNICIPAL |
| <input checked="" type="checkbox"/> (5) OTHER (specify): | | | (5) DYES/INKS | (5) NON-FERROUS SMLTG. WASTES | (5) OTHER (specify): |
| polymerized tars and resins | | | (6) CYANIDE | (6) OTHER (specify): | |
| hardened sludges | | | (7) PHENOLS | | |
| | | | (8) HALOGENS | | |
| | | | (9) PCB | | |
| | | | (10) METALS | | |
| | | | (11) OTHER (specify): | | |

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

solvents
tars
resins
heavy metals

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.
Old landfill area has been capped. Monitoring wells are in place. Plant has french drain system in place which drains to plant sewer system. Plant has NPDES Permit.

VI. HAZARD DESCRIPTION

| A. TYPE OF HAZARD | B. POTENTIAL HAZARD (mark 'X') | C. ALLEGED INCIDENT (mark 'X') | D. DATE OF INCIDENT (mo., day, yr.) | E. REMARKS |
|--|--------------------------------|--------------------------------|-------------------------------------|---|
| 1. NO HAZARD | | | | |
| 2. HUMAN HEALTH | | | | |
| 3. NON-WORKER INJURY/EXPOSURE | | | | |
| WORKER INJURY | | | | |
| 4. CONTAMINATION OF WATER SUPPLY | X | | | leachate, if generated, could migrate to Patapsco River |
| 5. CONTAMINATION OF FOOD CHAIN | | | | |
| 6. CONTAMINATION OF GROUND WATER | X | | | leachate, if generated, could migrate to Patapsco River |
| 7. CONTAMINATION OF SURFACE WATER | X | | | leachate, if generated, could migrate to Patapsco River |
| 8. DAMAGE TO FLORA/FAUNA | | | | |
| 9. FISH KILL | | | | |
| 10. CONTAMINATION OF AIR | | | | |
| 11. NOTICEABLE ODORS | | | | |
| 12. CONTAMINATION OF SOIL | | | | |
| 13. PROPERTY DAMAGE | | | | |
| 14. FIRE OR EXPLOSION | | | | |
| 15. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS | | | | |
| 16. SEWER, STORM DRAIN PROBLEMS | | | | |
| 17. EROSION PROBLEMS | | | | |
| 18. INADEQUATE SECURITY | | | | |
| 19. INCOMPATIBLE WASTES | | | | |
| 20. MIDNIGHT DUMPING | | | | |
| 21. OTHER (specify): | | | | |

ORIGINAL
(Red)

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☒ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☒ 3. STATE PERMIT (specify): DHS (expired)
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER:
☒ 7. RCRA STORER ☒ 8. RCRA TREATER ☒ 9. RCRA DISPOSER #MD-003671875
☐ 10. OTHER (specify):

B. IN COMPLIANCE?

- ☒ 1. YES ☐ 2. NO ☐ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number):

VIII. PAST REGULATORY ACTIONS

- ☒ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

| 1. TYPE OF ACTIVITY | 2. DATE OF PAST ACTION (mo., day, & yr.) | 3. PERFORMED BY: (EPA/State) | 4. DESCRIPTION |
|-----------------------|--|------------------------------|-------------------------------|
| compliance inspection | regular | MD DHMH | Regular inspections conducted |
| | | | |
| | | | |

X. REMEDIAL ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

| 1. TYPE OF ACTIVITY | 2. DATE OF PAST ACTION (mo., day, & yr.) | 3. PERFORMED BY: (EPA/State) | 4. DESCRIPTION |
|----------------------------|--|------------------------------|----------------|
| Site graded, capped | --- | private | --- |
| Monitoring wells installed | --- | private | --- |
| | | | |

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

ORIGINAL
(Red)

ORIGINAL
(Red)

HAZARDOUS WASTE SITE ASSESSMENT REPORT

FINAL REPORT

BATA SHOE COMPANY
U.S. ROUTE 40, BELCAMP, MD

MD-77

JRB NO; 2-817-03-513-36

PREPARED FOR: USEPA REGION III
MD DEPT OF HEALTH AND MENTAL HYGIENE

PREPARED BY: JRB ASSOCIATES
8400 WESTPARK DRIVE
MCLEAN, VIRGINIA 22102

DATE: FEBRUARY 15, 1982

ORIGINAL
(Red)

TABLE OF CONTENTS

1.0 SUMMARY AND RECOMMENDATIONS

APPENDIX A: SURFACE IMPOUNDMENT ASSESSMENT REPORT

APPENDIX B: FORM T2070-2 - USEPA POTENTIAL HAZARDOUS WASTE
SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

ORIGINAL
(Red)

1.0 SUMMARY AND RECOMMENDATIONS

The Bata Shoe Company owns and operates a manufacturing facility on Route 40, in Belcamp, Harford County, Maryland. The facility produced canvas and rubber footwear. The facility discharged wastewater from its production lines to 3 on-site surface impoundments. The wastewater contained waste latex, which solidified at the bottom of the surface impoundments. These impoundments were identified in EPA's Surface Impoundment Assessment as having a high priority because of potential endangerment to current water supplies (see Appendix A).¹ Background data was collected during the period 12/1/81 to 12/14/81. No site inspection was conducted.

The background data revealed that the Bata Shoe Company notified the state of Maryland Water Resources Administration in 1978 that they planned to de-water and cover the surface impoundments. The Administration took samples of the latex sludge in the bottom of the impoundments for testing. The sludge was found to be very hard, and rubbery. Tests found the sludge to be non-toxic,² and the plan to de-water and cover the impoundments was approved. The impoundments were de-watered and filled in with local soil, and the area was graded and compacted. The Bata Land Development Company planned to sell the land to another developer, and at last report, a concrete plant for the site was in the planning stages.³

Based upon the information gathered, the following conclusion was reached:

- The latex sludge present in the Bata surface impoundments is not toxic, and does not pose a threat to ground water in the region. The impoundments were de-watered, covered, compacted and graded. At last report, a concrete manufacturing plant was planned for the site.

¹USEPA Surface Impoundment Assessment Report. Prepared by J. Burke. 11/7/80.

²Personal Communication with Mr. Paul Thompson, MD DHMH. 10/22/81.

³Personal Communication with Mr. Paul Thompson, MD DHMH. 12/7/81.

ORIGINAL
(Red)

Recommendations

Based upon our conclusions, it is suggested that no further action be taken at this site, as the waste of concern poses no threat to ground water supplies in the area.

ORIGINAL
(Red)

APPENDIX A: USEPA SURFACE IMPOUNDMENT
ASSESSMENT REPORT

10003

SIA # 025/00006 (IND)

CONTAMINATION POTENTIAL
(MANUAL FOR EVALUATING CONTAMINATION POTENTIAL OF SURFACE IMPOUNDMENTS)

MD-77
ORIGINAL
(Red)

NAME/LOCATION BATA SHOE CO., U.S. RT. 40, BELCAMP, MD 21017

ADDRESS Hartford Co. PH. (301) 272-2000

NPDES# _____ SIC 3021 ^{RUBBER}_{FOOTWEAR} LAT. 39°28'32" - LONG. 76°15'00"

THE CONTAMINATION POTENTIAL IS LOW MODERATE HIGH VERY HIGH

NO. OF SITES 3 AGE 5 LINER _____ THICKNESS _____ AREA 0.13

UNSATURATED ZONE 9B-B WATER QUALITY 5A GROUNDWATER AVAILABILITY 5A-A

HAZARD OF CONTAMINANT 7-A 6 TOTAL GROUNDWATER CONTAMINATION POTENTIAL 25 25

ENDANGERMENT TO CURRENT WATER SUPPLIES 9A-B MONITORING WELLS 4

FREQUENCY OF MONITORING _____ SIGNIFICANT CHANGES IN GROUNDWATER YES

ADVERSELY UNK NOT IN USE

REMARKS: Reference: Surface Impoundment Assessment & "The Water Resources of Baltimore and Hartford Counties".

The site is underlain by the Patuxent formation, which consists of irregular and lenticular beds of gravel, sand, and clay. The water table is about 45 feet from the surface and the saturated thickness is approximately 50 feet.

Ground water is expected to flow towards Bush River. The water is of excellent quality.

The waste hazard rating is based on the SIC code, Rubber and Plastic Footwear.

There appears to be a water supply well nearby. EPA does not have any documentation regarding other surface impoundments or injection wells in the area.

RECEIVED

cc: J. Gary Gardner 3AH00
Robert Allen 3AH30
Bruce Smith 3SA30
Abraham Ferdas 3EN10
Benjamin A. Lacy 3WA32

Prepared By: Jeffrey J. Burke JJB
Date: November 7, 1980

ORIGINAL
(Red)

APPENDIX B: U.S. EPA FORM T2070-2
POTENTIAL HAZARDOUS WASTE
IDENTIFICATION AND
PRELIMINARY ASSESSMENT



POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION 3 SITE NUMBER (to be assigned by HQ) MD-77

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

| | | | |
|---|----------------|--|--|
| A. SITE NAME Bata Show Company | | B. STREET (or other identifier) U.S. Route 40 | |
| C. CITY Belcamp | D. STATE MD | E. ZIP CODE 21017 | F. COUNTY NAME Harford |
| G. OWNER/OPERATOR (if known) 1. NAME Bata Shoe Company | | 2. TELEPHONE NUMBER 301-272-2000 | |
| H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN | | | |
| I. SITE DESCRIPTION Site manufactured canvas and rubber footwear. Three old impoundments were used to hold waste latex sludge. Impoundments were de-watered, sludge tested by EP toxic and found to be non-toxic | | | |
| J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Surface Impoundment Assessment | | | K. DATE IDENTIFIED (mo., day, & yr.) 10/21/80 |
| L. PRINCIPAL STATE CONTACT 1. NAME Mr. Paul Thompson, Md. Dept. of Health and Mental Hygiene | | 2. TELEPHONE NUMBER 301-383-6650 | |

II. PRELIMINARY ASSESSMENT (complete this section last)

| | |
|---|--|
| A. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input type="checkbox"/> 3. LOW <input checked="" type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN | |
| B. RECOMMENDATION <input checked="" type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input type="checkbox"/> 3. SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority) | |

| | | |
|--|-------------------------------------|--------------------------------------|
| C. PREPARER INFORMATION | | |
| 1. NAME Edward Tokarski, JRB Associates | 2. TELEPHONE NUMBER 703-821-4600 | 3. DATE (mo., day, & yr.) 12/9/81 |

III. SITE INFORMATION

| | |
|---|---|
| A. SITE STATUS <input type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) <input checked="" type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.) <input type="checkbox"/> 3. OTHER (specify): | |
| B. IS GENERATOR ON SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify generator's four-digit SIC Code): 3021 | |
| C. AREA OF SITE (in acres) --- | D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES 1. LATITUDE (deg.-min.-sec.) 39° 28' 38" N 2. LONGITUDE (deg.-min.-sec.) 76° 15' 00 W |
| E. ARE THERE BUILDINGS ON THE SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify): concrete manufacturing plant (Reported) | |

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

| X' A. TRANSPORTER | X' B. STORER | X' C. TREATER | X' D. DISPOSER |
|---------------------|------------------------|---------------------------|--------------------------|
| 1. RAIL | 1. PILE | 1. FILTRATION | 1. LANDFILL |
| 2. SHIP | 2. SURFACE IMPOUNDMENT | 2. INCINERATION | 2. LANDFARM |
| 3. BARGE | 3. DRUMS | 3. VOLUME REDUCTION | 3. OPEN DUMP |
| 4. TRUCK | 4. TANK, ABOVE GROUND | 4. RECYCLING/RECOVERY | 4. SURFACE IMPOUNDMENT |
| 5. PIPELINE | 5. TANK, BELOW GROUND | 5. CHEM./PHYS. TREATMENT | 5. MIDNIGHT DUMPING |
| 6. OTHER (specify): | 6. OTHER (specify): | 6. BIOLOGICAL TREATMENT | 6. INCINERATION |
| | | 7. WASTE OIL REPROCESSING | 7. UNDERGROUND INJECTION |
| | | 8. SOLVENT RECOVERY | 8. OTHER (specify): |
| | | 9. OTHER (specify): | |

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Site used to dispose of waste latex rubber sludge. Impoundments de-watered, filled in with soil, compacted and capped. Report that concrete mixing plant now located on-site.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. UNKNOWN ☐ 2. LIQUID ☐ 3. SOLID ☒ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE

☒ 10. OTHER (specify): Tested for EP toxic - test negative

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

| a. SLUDGE | b. OIL | c. SOLVENTS | d. CHEMICALS | e. SOLIDS | f. OTHER |
|---|----------------------|------------------------------|-----------------------|-------------------------------|----------------------------|
| AMOUNT X | AMOUNT | AMOUNT | AMOUNT | AMOUNT | AMOUNT |
| UNIT OF MEASURE X | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE |
| (1) PAINT, PIGMENTS | (1) OILY WASTES | (1) HALOGENATED SOLVENTS | (1) ACIDS | (1) FLYASH | (1) LABORATORY PHARMACEUT. |
| (2) METALS SLUDGES | (2) OTHER (specify): | (2) NON-HALOGENATED SOLVENTS | (2) PICKLING LIQUORS | (2) ASBESTOS | (2) HOSPITAL |
| (3) POTW | | (3) OTHER (specify): | (3) CAUSTICS | (3) MILLING/ MINE TAILINGS | (3) RADIOACTIVE |
| (4) ALUMINUM SLUDGE | | | (4) PESTICIDES | (4) FERROUS SMLTG. WASTES | (4) MUNICIPAL |
| X (5) OTHER (specify): Latex rubber from manufacture of tennis shoes | | | (5) DYES/INKS | (5) NON-FERROUS SMLTG. WASTES | (5) OTHER (specify): |
| | | | (6) CYANIDE | (6) OTHER (specify): | |
| | | | (7) PHENOLS | | |
| | | | (8) HALOGENS | | |
| | | | (9) PCB | | |
| | | | (10) METALS | | |
| | | | (11) OTHER (specify): | | |

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

ORIGINAL
(Red)

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

VI. HAZARD DESCRIPTION

| A. TYPE OF HAZARD | B. POTENTIAL HAZARD (mark 'X') | C. ALLEGED INCIDENT (mark 'X') | D. DATE OF INCIDENT (mo., day, yr.) | E. REMARKS |
|--|--------------------------------|--------------------------------|-------------------------------------|------------|
| 1. NO HAZARD | X | | | |
| 2. HUMAN HEALTH | | | | |
| 3. NON-WORKER INJURY/EXPOSURE | | | | |
| 4. WORKER INJURY | | | | |
| 5. CONTAMINATION OF WATER SUPPLY | | | | |
| 6. CONTAMINATION OF FOOD CHAIN | | | | |
| 7. CONTAMINATION OF GROUND WATER | | | | |
| 8. CONTAMINATION OF SURFACE WATER | | | | |
| 9. DAMAGE TO FLORA/FAUNA | | | | |
| 10. FISH KILL | | | | |
| 11. CONTAMINATION OF AIR | | | | |
| 12. NOTICEABLE ODORS | | | | |
| 13. CONTAMINATION OF SOIL | | | | |
| 14. PROPERTY DAMAGE | | | | |
| 15. FIRE OR EXPLOSION | | | | |
| 16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS | | | | |
| 17. SEWER, STORM DRAIN PROBLEMS | | | | |
| 18. EROSION PROBLEMS | | | | |
| 19. INADEQUATE SECURITY | | | | |
| 20. INCOMPATIBLE WASTES | | | | |
| 21. MIDNIGHT DUMPING | | | | |
| 22. OTHER (specify): | | | | |

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): _____
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER
☐ 10. OTHER (specify): _____

ORIGINAL
(Red)

B. IN COMPLIANCE?

- ☐ 1. YES ☐ 2. NO ☐ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): _____

VIII. PAST REGULATORY ACTIONS

- ☒ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

- ☒ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

| 1. TYPE OF ACTIVITY | 2. DATE OF PAST ACTION (mo., day, & yr.) | 3. PERFORMED BY: (EPA/State) | 4. DESCRIPTION |
|---------------------|--|------------------------------|----------------|
| | | | |
| | | | |
| | | | |

X. REMEDIAL ACTIVITY (past or on-going)

- ☒ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

| 1. TYPE OF ACTIVITY | 2. DATE OF PAST ACTION (mo., day, & yr.) | 3. PERFORMED BY: (EPA/State) | 4. DESCRIPTION |
|---------------------|--|------------------------------|-------------------------------|
| dewatering | 1979 | private | lagoon dewatered |
| fill/grade/cap | 1979 | private | lagoon filled, graded, capped |
| | | | |

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.